

EXHIBIT

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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF KATHLEEN STANTON

I, Kathleen Stanton, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. I was employed at AON Risk Services on September 11, 2001. When the terrorist attacks occurred, I was in my office on the 92nd floor of Two World Trade Center. When the first plane struck Tower One, it blew in the windows on the south side of the building where I was located. The floor of my office filled with smoke and we evacuated down the stairwell. On the 76th floor, we found service elevators. As I was standing in front of the service elevators, the plane hit Tower Two. The orange "I" beam between the service elevators broke through the wall causing the ceiling to collapse on me. Large chunks of plaster injured my right knee and my left

leg and I was forced to inhale the thick toxic dust that surrounded me. I also suffered burns to both of my feet.

4. Despite my lower extremity injuries, I somehow made it down the stairwell and reached the Concourse level where a fireman yelled for me to run. I went through the broken glass and crossed the street just as Tower Two collapsed. I was in the debris field from the collapsed building. I fled to the river where I was treated by EMTs and transported by stretcher to a ferry.

5. As a result of these horrific terrorist attacks, I suffered the following injuries: burns on both feet, a right knee sprain with torn medial meniscus, severe left leg lymphedema with left leg weakness from the crushing injury, and damage to my lungs from the smoke, debris, and chemicals that I inhaled prior to my escape.

6. Lymphedema is a permanent chronic progressive condition with no known cure at the present time. I have been classified as totally disabled as a result of this injury. I suffer from pain and swelling in the left leg, which is greater as the day progresses or as I participate in physical activity. The chronic swelling has resulted in tight skin as well as fibrotic bulges on my the left foot, ankles, and my upper thigh. Fibrotic tissue is one of the complications of lymphedema. I also have a decreased range of motion due to the swelling. The swelling, fibrosis, and compression require intensive daily skin care which includes special cleansers, lotions, antibiotic ointment, and prophylactic oral antibiotics when needed. I further wear a custom compression stocking during the day and an elastic night compression brace with compression bandages applied over it. Over the past twenty years since these attacks, I have continued to experience swelling with pain in my lower extremities. Additionally, I have left leg pain and numbness, occasional right knee pain and swelling, and shortness of breath upon exertion.

7. Due to the toxic chemicals and dust that I inhaled, I suffered, and continue to suffer, aerodigestive upper respiratory disease, aerodigestive-obstructive airway disease, small airway disease, asthma, chronic rhinitis in my nasal tissues, and gastroesophageal reflux disease. The severity of my injuries varies from day to day, but they interfere with the quality of my life and are a constant reminder of the initial circumstances of these injuries.

8. The carnage I experienced on September 11, 2001 is etched in my memory. I arrived at 8:00 a.m. and was in a meeting with 12 people (only 4 of whom made it out that morning). In the course of the attack and my escape, I witnessed atrocities beyond the imagination of the average citizen. I was surrounded by dead bodies, burning and falling building debris, and thick clouds of smoke and chemicals. The situation could only be compared to a war zone.

9. I suffered, and continue to suffer, PTSD and severe emotional distress because of the World Trade Center terrorist attacks. My enjoyment of life is greatly compromised as I suffered, and continue to suffer from depression, insomnia, lack of concentration, and anxiety.

10. Attached as Exhibit B to this Declaration is a true and correct copy of my select relevant medical records related to the treatment that I received for my physical and emotional injuries following the September 11, 2001 terrorist attacks.

11. I previously pursued a claim (Claim Number VCF 212-003537) through the September 11th Victim Compensation Fund specifically related the physical injuries that I received on September 11, 2001, and my claim was determined to be eligible for compensation.

I declare UNDER PENALTY OF PERJURY that the foregoing is true and correct.

EXECUTED on this 13th day of January 2021.


KATHLEEN STANTON

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FILED
UNDER SEAL
(ECF No.
5716)**